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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

PATRICIA J. SHANNON,)	2:11-CV-00394-JCM-LRL
)	
Plaintiff,)	DEFENDANT'S REQUEST FOR
)	EXTENSION OF TIME TO FILE
V.)	AN ANSWER OR APPROPRIATE
)	PLEADING TO PLAINTIFF'S
MICHAEL J. ASTRUE,)	COMPLAINT
COMMISSIONER OF)	
SOCIAL SECURITY)	(First Request)
)	
Defendant.)	

COMES NOW Defendants, by and through Daniel G. Bogden,
 United States Attorney for the District of Nevada, and Carlos A.
 Gonzalez, Assistant United States Attorney, and respectfully
 moves for a fourteen (14) day extension of time to and including
 July 29, 2011 in which to file a responsive pleading in response
 to plaintiffs' Complaint.

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1 In support of this request for an extension of time,
2 Defendants rely upon the Memorandum of Points and Authorities set
3 forth below.

4 DATED this 8TH day of July 2011.

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6 Respectfully submitted,

7 DANIEL G. BOGDEN
8 United States Attorney

9 /s/ Carlos A. Gonzalez
10 Carlos A. Gonzalez
11 Assistant United States Attorney
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MEMORANDUM OF POINTS AND AUTHORITIES

I. BACKGROUND

The instant controversy involves the denial of Social Security benefits to plaintiff, Patricia J. Shannon.

The regional counsels' office for the Social Security Administration in San Francisco, California have designated Mr. Sundeeep Patel, to assist undersigned counsel with the preparation and submission of the agency meaningful response to plaintiffs complaint. Presently, a copy of the administrative record has been prepared and counsel for the defendant is in the process of completing the answer to the complaint but additional time is needed to ascertain the veracity of some of the allegations in the complaint and coordinate the submission of defendant's answer.

II. ARGUMENT

The Federal Rules of Civil Procedure provide for an enlargement of time for cause shown.

When an act may or must be done within a specified time, the court may, for good cause, extend the time . . . if a request is made, before the original time or its extension expires

Fed. R. Civ. P., Rule 6(b).

This request is made prior to the expiration of time permitted to respond to Plaintiff's Complaint.

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1 **III. CONCLUSION**

2 Undersigned counsel contacted Mr. Richard E. Donaldson,
3 counsel for plaintiff to ascertain his position on our request.
4 Mr. Donaldson indicated that he does not oppose the instant
5 request for a fourteen (14) day extension of time.

6 Therefore, the Defendants respectfully request that this
7 honorable Court grant an additional fourteen (14) day extension
8 of time, up to and including July 29, 2011, to respond to
9 Plaintiff's Complaint.

10 DATED this 8th day of July, 2011.

11 Respectfully submitted,
12 Daniel G. Bogden
United States Attorney

13 //s// CARLOS A. GONZALEZ
14 Carlos A. Gonzalez
Assistant United States Attorney

16 IT IS SO ORDERED:

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UNITED STATES MAGISTRATE JUDGE
20 DATE: 7-11-11 _____